

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

IN RE: Cynthia Deavers Forsman

**RESPONSE TO MOTION FOR STAY  
RELIEF**

JP MORGAN CHASE BANK, N.A.  
*Plaintiff*

Case number: 19-50909

v.

CYNTHIA DEAVERS FORSMAN

and HERBERT BESKIN, Trustee  
*Defendants*

COMES NOW the Debtors/Defendants, Cynthia Deavers Forsman, by counsel, and responds to the Motion for Stay Relief dated May 26, 2023 as follows:

1. Debtor admits the allegations set forth in paragraph one (1) of the aforesaid motion for stay relief.
2. Debtor admits the allegations set forth in paragraph two (2) of the aforesaid motion for stay relief.
3. Debtor admits the allegations set forth in paragraph three (3) of the aforesaid motion for stay relief.
4. Debtor admits the allegations set forth in paragraph four (4) of the aforesaid motion for stay relief.
5. Debtor admits the allegations set forth in paragraph five (5) of the aforesaid motion for stay relief.

However, Debtor reports that she has paid \$1,726.48 and has made arrangements with the Plaintiff to pay the remaining portion of the arrearage by July 31, 2022.

6. Debtor is without sufficient information to admit or deny the allegations set forth in paragraph six (6) of the aforesaid motion for stay relief and, accordingly, requires strict proof thereof.
7. Debtor denies the allegations set forth in paragraph seven (7) of the aforesaid motion for stay relief.
8. Debtor denies the allegations set forth in paragraph eight (8) of the aforesaid motion for stay relief.

WHEREFORE, Debtor(s) pray that the aforesaid Motion for Stay Relief be denied.

/s/ Roland S. Carlton, Jr.

Counsel

Roland S. Carlton, Jr., Esq.  
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**CERTIFICATE**

I, Roland S. Carlton, Jr., Esq., do hereby certify that a true and accurate copy of this Response to Motion for Stay Relief was delivered by ECF on June 13, 2022 to:

Brandon R. Jordan, Esq.  
Robertson, Anschutz, Schneid, Crane & Partners, PLLC  
11900 Parkland Drive, Suite 310  
Rockville, MD 20852

HERBERT BESKIN, Trustee  
P. O. Box 2103  
Charlottesville, VA 22902-2103

/s/ Roland S. Carlton, Jr.

Roland S. Carlton, Jr., Esq.